

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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JOHNNA L. AYRES,

CIVIL ACTION NO. 21 CV 0473
(ERK)(PK)

**DEFENDANTS' NOTICE
OF MOTION**

Plaintiff,

-against-

ROBERT J. SHIVER, ROBERT J. SHIVER, LLC,
and PRUDENT REVERE CAPITAL GROUP, INC.,

Defendants.

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PLEASE TAKE NOTICE that upon all prior pleadings and proceedings heretofore filed herein, the undersigned, on behalf of the Defendants, shall move this Court pursuant to Fed.R.Civ.P. 12(b)(6), for an Order dismissing Plaintiff's Complaint in its entirety, for failure to state a claim, and for such other and further relief as the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that pursuant to F.R.C.P. 6 and Local Rule 6.4, Plaintiff's opposition papers, if any, must be served upon the undersigned by the time required by the Rules.

Dated: New York, New York

May 14, 2021

Respectfully submitted,



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